

EXHIBIT S

From: Justin Quinn <JQuinn@rwmlegal.com>

Sent: Tuesday, May 1, 2018 9:34 AM

To: Rivera-Soto, Roberto A. <RiveraSotoR@ballardspahr.com>

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Subject: Williams, et al. v. BASF Catalysts LLC, et al., Case No. 11-1754 (JLL) (JAD)

Dear Justice Rivera-Soto,

With respect to plaintiffs' motion to compel certain documents that plaintiffs claim are not privileged, ECF No. 477, BASF respectfully requests oral argument on the motion. Because it will be necessary for BASF to discuss privileged information, at least part of this oral argument would need to take place *in camera* and *ex parte*.

Respectfully submitted,

Justin Quinn

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